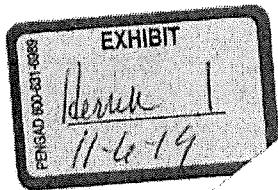


**DEFENDANT TURTLE WAX, INC.'S  
EXHIBIT F**

IN THE COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY

EXPERT REPORT OF  
ROBERT F. HERRICK, Sc.D., CIH, FAIHA



timeframe of 2000s. Mr. Rhyne left work in May of 2015, received 6 months of short-term disability and then went on long-term disability.

Table 3 Daily Average Benzene Exposure by Product and Facility

Process/Product	Daily Exposure Midpoint (ppm)	Daily Exposure Range (ppm)
<b>Kutzit</b>		
Home use	0.04	0.03 – 0.06
East Lincoln High School	Not determined	–
Setzer's 1974	1.22	–
Setzer's 1975	0.005	–
Duke Energy – Maintenance	0.024	0.002 – 0.048
<b>Rust Penetrant Liquid Wrench</b>		
Home use	0.01	–
East Lincoln High School	0.075	0.004 – 0.25
Setzer's	0.02	0.001 – 0.07
Duke Energy – Pipe Fab Shop		
LW containing 3% benzene	1.5	1.3 – 1.7
LW containing 5% benzene	2.5	2.17 – 3.02
LW containing 7% benzene	3.5	3.2 – 3.8
<b>Safety-Kleen Mineral Spirits Parts Washers</b>		
East Lincoln High School	0.21	0.11 – 0.41
Setzer's	0.05	–
Duke Energy – Pipe Fab Shop	0.82	0.41 – 1.65
Duke Energy – Maintenance	0.2	0.11 – 0.38
<b>Mineral Spirits Cleaning</b>		
Duke Energy – Maintenance	0.56	0.34 – 1.09
<b>Spotcheck</b>		
Duke Energy	Not determined	–
<b>Tap Magic/Rapid tap</b>		
Duke Energy	Not determined	–
<b>CRC products</b>		
Duke energy – Maintenance [10 ppm benzene]	0.007	0.003 – 0.013
Duke energy – Maintenance [100 ppm benzene]	0.07	0.04 – 0.13
<b>Kroil</b>		
Duke Energy – Maintenance	0.5	0.01 – 1.0
<b>Marvel Mystery Oil</b>		
Duke Energy – Maintenance	Not determined	–

## DERMAL EXPOSURES

Mr. Rhyne stated that he had skin contact with some materials he worked with, particularly Liquid Wrench while he was beveling and cutting metal parts. The potential for skin exposure to

Table 4. Cumulative Benzene Exposure by Product and Facility

Process/Product	Cumulative Exposure Midpoint (ppm-years)	Cumulative Exposure Range (ppm-years)
<b>Kutzit</b>		
Home use	0.24	0.18 – 0.36
East Lincoln High School	Not determined	–
Setzer's 1974	1.22	–
Setzer's 1975	0.05	–
Duke Energy – Maintenance	0.31	0.03 – 0.62
<b>Rust Penetrant Liquid Wrench</b>		
Home use	0.1	–
East Lincoln High School	0.15	0.08 – 0.5
Setzer's	0.048	0.002 – 0.142
<b>Duke Energy – Pipe Fab Shop</b>		
LW containing 3% benzene	3.75	3.25-4.25
LW containing 5% benzene	6.25	5.42-7.55
LW containing 7% benzene	8.75	8.00-9.50
<b>Safety-Kleen Mineral Spirits Parts Washers</b>		
East Lincoln High School	0.42	0.22 – 0.82
Setzer's	0.1	0.06 – 0.2
Duke Energy – Pipe Fab Shop	2.40	1.23 – 4.95
Duke Energy – Maintenance	1.4	0.77 – 2.66
<b>Mineral Spirits Cleaning</b>		
Duke Energy – Maintenance	2.8	1.7 – 5.45
<b>Spotcheck</b>		
Duke Energy	Not determined	–
<b>Tap Magic/Rapid tap</b>		
Duke Energy	Not determined	–
<b>CRC products</b>		
Duke Energy – Maintenance		
10 ppm benzene	0.049	0.021 – 0.091
100 ppm benzene	0.49	0.21 – 0.91
<b>Kroil</b>		
Duke Energy – Maintenance	3.5	0.07 – 7.0
<b>Marvel Mystery Oil</b>		
Duke Energy – Maintenance	Not determined	–
<b>Total</b>		
Low (3% benzene LW; 10 ppm benzene CRC)	17.07	8.86 – 28.37
Medium (5% benzene LW; 10 ppm benzene CRC)	19.57	13.04 – 33.5
High (7% benzene LW; 100 ppm benzene CRC)	21.63	13.8 – 34.44